

1 don't we direct him --

2 MR. COHEN: Sure.

3 MR. TOPEL: Why don't you direct him to the --

4 MR. COHEN: Sure.

5 MR. TOPEL: -- paragraph --

6 MR. ESPINOZA: No, I'm, I'm --

7 MR. TOPEL: Thank you.

8 BY MR. COHEN:

9 Q Mr. Topel's --

10 A I'm looking, I'm looking for this --

11 Q Sure.

12 A And you're absolutely right.

13 Q Yes. There's no reference to NMTV. Now, look at
14 237, and that's the Annual Meeting of NMTV. Am I correct?

15 A 237?

16 Q Yeah. The next exhibit.

17 A Yes, sir.

18 Q And my question is, do you have any recollection as
19 to whether the Annual Meeting of NMTV was a separate meeting
20 or whether it was held in conjunction with the Annual Meeting
21 of Trinity Christian, Trinity Christian Center of Santa Ana?

22 A Mr. Cohen, there were times when it would start off
23 as a combined meeting, then break off into -- I, I'm trying to
24 figure out why it, it, it wasn't in this other exhibit, and
25 the only thing that I can determine is that there were

1 occasions when they would then break off into separate meet-
2 ings, sir. That's the only thing that I can determine.

3 Q But isn't it true that the, the -- in your deposi-
4 tion, when Mr. Shook asked you that question, and I re-- and
5 I'm referring to page 53 in, in Washington, he asked you the
6 question at line 18, "Reverend, what I'd like you to focus on
7 initially is that the Minutes of the Annual Meeting of
8 National Minority TV and the Minutes that you are holding in
9 your hand, that being the Annual Meeting of Christian --
10 Trinity Christian Center of Santa Ana, Inc., and Affiliated
11 Corporations, both reflect that the meetings were held on
12 January 23, 1989. Do you have any recollection as to whether
13 the Annual Meeting of National Minority TV was a separate
14 meeting or whether it was held in conjunction with the Annual
15 Meeting of Trinity Christian Center of Santa Ana and the
16 Affiliated Corporations?" And your answer was, "It's my
17 memory that they were together."

18 Now, you'll notice that in 1989, according to
19 Exhibit 237, that a new face as a, as a corporate officer for
20 NMTV, a woman named Charlene Williams. Do you see that?

21 A Yes, sir.

22 Q First of all, do you know who Charlene Williams is?

23 A I believe I met her a couple of times, but if I saw
24 her right now I wouldn't remember her.

25 Q Did you know what her position was at Trinity?

1 A I don't think so, sir, no.

2 Q And were you, were you aware that she was going to
3 be proposed as an officer?

4 A Mr. Cohen, Charlene -- I, I don't remember. As, as
5 in the past, I don't remember if Mrs. Duff mentioned it to me
6 or not. I really don't.

7 Q And do you know what she did as Assistant Secretary?

8 A No, sir.

9 Q Now, do you recall earlier before we had the lun-
10 cheon recess I asked you about the -- what you understood the
11 affiliate relationship to be between NMTV and Trinity? Do you
12 recall that?

13 A Yes, sir.

14 Q And do you recall your answer was that it is spiri-
15 tual and, and there was a bond between the two --

16 A Yes, sir.

17 Q Now, I want to bring you now up to the time that the
18 -- that NMTV operated the Odessa station.

19 A Um-hum.

20 Q Now, how would you describe an affiliate relation-
21 ship between NMTV and TBN which existed then?

22 A Mr. Cohen, I also believe that there was the spirit
23 of, of, of relationship that bonded us together because we had
24 the same vision and the same purpose, sir.

25 Q So, it didn't change?

1 A Well --

2 Q Given your view right now.

3 A In, in, in my view. I'm not -- some of the techni-
4 cal terms I'm not familiar with, but my concern was always the
5 spirit, the purpose, the vision of what we were trying to
6 accomplish, sir.

7 Q And from your perspective, that's always what the
8 word affiliate meant, that you had the same purpose? That is,
9 NMTV and TBN had the same purpose of spreading the gospel?

10 A Yes, sir.

11 Q Which, of course, is the reason you were involved in
12 NMTV?

13 A I believe that my church is a separate corporation,
14 but we are affiliated with the Assemblies of God because we
15 have the same vision, the same God, and that's why I have that
16 feeling about affiliation.

17 Q And that never changed, did it? Why -- as far as
18 you were concerned?

19 A Correct, sir.

20 Q So far as NMTV and Trinity?

21 A Yes, sir.

22 Q Now, we've reviewed many of these Minutes and I
23 don't want to take the time to do it again, but you will, you
24 will recall that there were several years where the, the
25 annual meeting of NMTV was held in conjunction with the annual

1 meeting of Trinity Broadcasting Network and its other related
2 companies?

3 A Yes, sir.

4 Q And did, did the fact that the corporations were
5 meeting together bother you at all?

6 A No.

7 Q You thought it was appropriate?

8 A It just didn't bother me, sir.

9 Q Well, in, in point of fact, didn't you think it was
10 appropriate?

11 A I thought it was fine.

12 Q And that was because of the, of the affiliation that
13 you've described?

14 A Yes, sir.

15 Q Would you look at Bureau Exhibit 3 1 5? It would be
16 in Volume --

17 A Five?

18 Q -- 5.

19 A Mr. Cohen, which exhibit was that again, please?

20 Q 3 1 5.

21 A 3 1 5, 3 1 5.

22 Q Now, if you will notice, this was not a meeting that
23 you attended. I, I understand that. But what I want to ask
24 you, was your, your view when you consented to this, were you
25 told in advance by Mrs. Duff what the special meeting was

1 going to deal with before it occurred?

2 A I'm sorry, Mr. Cohen. If I might have a moment to
3 read it first?

4 Q Certainly.

5 A Sir.

6 Q Now, did Mrs. Duff talk with you about the, the
7 agenda of this meeting before it occurred on June 19, 1990?

8 A Mr. Cohen, my, my best recollection is that she
9 called me prior to the meeting and told me what was going to
10 happen or what the -- was on the agenda. The only thing that,
11 that I can think of that the reason I did not attend, it was a
12 very important meeting, was because I had an emergency.
13 That's the only thing that would have kept me away.

14 Q It wasn't at all being critical of you not being
15 there. That was not the import of my question and I -- if I
16 gave you that understanding, it --

17 A No, you, you -- actually, you didn't, sir.

18 Q That was not what I --

19 A You didn't.

20 Q -- what I tried to do at all. I wasn't criticizing
21 that. I was just trying to understand whether you were aware
22 prior to the meeting as to what was going to be discussed at
23 the meeting.

24 A It's my impression that she had called me to give me
25 a rundown of the agenda, sir.

1 Q And I take it, then, and I don't propose to go into
2 the, the merits of this again, but you had then -- by that
3 point had agreed to sell -- to the sale of Odessa?

4 A Yes. Yes, sir.

5 Q Now, also, this Minute reflects that the Board
6 passed a resolution authorizing the purchase of a television
7 station for a price not to exceed five and a \$5,400,000, which
8 is a lot of money.

9 A It sure is.

10 Q Now, this was in Concord, and that's a market and
11 that's a community you're familiar with, right?

12 A Yes, sir.

13 Q And you had preached there, hadn't you?

14 A At a high school auditorium, sir.

15 Q And why did you think that Concord would be a -- an
16 appropriate market for NMTV to have a television station?
17 What, what city was it close to?

18 A Concord is, is, is, is, is -- it's sur-- it's sur-
19 rounded by a large -- it, it's almost like San Fernando
20 Valley, if, if you're familiar with that. One city ends here
21 and another one starts here, and so it's like a huge
22 metropolis area, and yet it's just a number of, of, of small
23 towns or small cities. I knew a number of pastors of, of that
24 particular area, and so I felt, I felt good about that area,
25 sir.

1 Q Because the station would have served a lot of
2 people?

3 A Yes, sir.

4 Q Now, did you and Mrs. Duff talk about where the sum
5 of \$5,400,000 was going to come from?

6 A Mr. Cohen, that I really don't remember. In the
7 past I remember that we would talk about it. But this specif-
8 ically, I don't remember, sir.

9 MR. COHEN: Your Honor, are we going to have an
10 afternoon break?

11 JUDGE CHACHKIN: Yes.

12 MR. COHEN: Could -- would you mind if we did it
13 now? Is that a --

14 JUDGE CHACHKIN: Are you at the -- getting close to
15 the end of this?

16 MR. COHEN: Well, I, I, I have a -- can we go off
17 the record, Your Honor?

18 JUDGE CHACHKIN: Yes. We'll go --

19 MR. COHEN: Can we be --

20 JUDGE CHACHKIN: -- off the record.

21 (Whereupon, a short recess was taken from 2:47 p.m.
22 until 3:00 p.m.)

23 JUDGE CHACHKIN: Continue, Mr. Cohen.

24 MR. COHEN: Pastor, pastor, would you please look at
25 Bureau Exhibit 72?

1 JUDGE CHACHKIN: 72?
2 MR. COHEN: Yes, sir.
3 MR. TOPEL: That's in Volume 2.
4 BY MR. COHEN:
5 Q Tell me when you've found that.
6 A Okay.
7 Q You've found it?
8 A Yes, sir.
9 Q You'll notice the, the second page of this document
10 is a certification, and you'll see it's a -- in the middle of
11 the page a certification of preferences, and there's two
12 certifications there, one for minority and one for diversifi-
13 cation. Do you see that, sir? Let me help you -- can I help
14 you find it?
15 A Certification of preference.
16 Q Yes. This is what I'm going to ask you about.
17 Just, just read to yourself the certification portion from
18 here down towards about to the bottom of the page.
19 A Okay.
20 Q Tell me when you've read it.
21 A Sir.
22 Q You are aware, of course, that, pastor, that NMTV
23 and its predecessor company was claiming these preferences --
24 A Excuse me. I'm sorry. But --
25 Q You were aware of that?

1 A Yes, sir.

2 Q And I want to just ask you a few questions about the
3 -- first of all, were you ever sent a copy of these certifica-
4 tions, such as the one you have before you, which was filed
5 with the Commission on February 28, 1984?

6 A No, sir. May I make a statement, Mr. Cohen?

7 Q Yes.

8 A In all fairness to, to Mrs. Duff, oftentimes I'd
9 been asked if, if I was sent something and I really should
10 have done it earlier. It was at my request that I asked that
11 nothing be sent. The office that I have at our church, we
12 were broken into at least three or four times, we're in the
13 kind of a neighborhood where that thing occurs. We had our PA
14 system stolen, things like that. And we had gone through that
15 for, for some time until we installed bars in the church and a
16 good alarm system. But in fairness to Mrs. Duff, I had, I had
17 requested that things not be sent to me, sir. This is, this
18 is why I would generally look at them at her office or --

19 Q Because you were afraid they'd be stolen?

20 A Yes, sir. Because of the vandalism that has oc-
21 curred in the past.

22 JUDGE CHACHKIN: When did you make this request to
23 Ms. Duff?

24 MR. ESPINOZA: Years ago, sir. I, I mean, almost
25 from the beginning, sir.

1 JUDGE CHACHKIN: When did you --

2 MR. ESPINOZA: This, this, this is a problem that --
3 there was a period of time in, in the San Fernando Valley
4 where there was a rash of, of these things going on. In one
5 year, there were four attempts of arson at -- of our church,
6 and so I was concerned. I'm almost certain, sir, that almost
7 from the beginning I requested that things not be sent.

8 JUDGE CHACHKIN: Where did you live? Did you live
9 at the same -- at the church?

10 MR. ESPINOZA: No, I do not live at the church.

11 JUDGE CHACHKIN: You have a different residence?

12 MR. ESPINOZA: Yes, sir.

13 JUDGE CHACHKIN: Well, why couldn't it be sent to
14 your residence?

15 MR. ESPINOZA: Well, I tried -- I don't even keep
16 legal documents in my home. We have a safe deposit box in the
17 bank, but we generally keep only church documents there.

18 JUDGE CHACHKIN: Well, you do receive mail at your
19 home, don't you?

20 MR. ESPINOZA: Yes, sir.

21 JUDGE CHACHKIN: Well, then why --

22 MR. ESPINOZA: But, but not legal documents, sir.

23 JUDGE CHACHKIN: Well, I'm just -- well, we're
24 talking about notices and letters and things of that nature.
25 These are not things that -- this is just to give you notice

1 what was going on in the Corporation.

2 MR. ESPINOZA: Yes, sir.

3 JUDGE CHACHKIN: I mean, you receive your bank
4 records from the bank. You receive your bills at your home.
5 What was preventing you from receiving all these other notices
6 at your home?

7 MR. ESPINOZA: The difference, sir, is that those
8 were personal items and this was a business that involved
9 someone else, sir.

10 JUDGE CHACHKIN: I don't --

11 MR. ESPINOZA: But that --

12 JUDGE CHACHKIN: -- understand that.

13 MR. ESPINOZA: Well, maybe I was wrong, sir, but at
14 the time that was my feeling, sir.

15 JUDGE CHACHKIN: Well, you said don't, don't send it
16 to the church. Did you specifically tell her not to send it
17 to --

18 MR. ESPINOZA: Don't, don't --

19 JUDGE CHACHKIN: -- your residence?

20 MR. ESPINOZA: Don't send it to me is, is, is what I
21 meant, sir.

22 JUDGE CHACHKIN: But certainly -- whatever reason
23 you had for not having it sent at your residence had nothing
24 to do with any break-ins at the church?

25 MR. ESPINOZA: I, I don't have a file system at

1 | home, sir. My files were at church. That's all I meant, sir.

2 | JUDGE CHACHKIN: We're not talking about file sys-
3 | tem. This would be a notice of a meeting for you to attend or
4 | for you to --

5 | MR. ESPINOZA: No, I'm not talking --

6 | JUDGE CHACHKIN: -- sign a document and return.
7 | What was wrong with sending it to your home?

8 | MR. ESPINOZA: I apologize, sir. Perhaps I didn't
9 | explain myself. I'm not talking about notices or documents
10 | for me to sign. I'm talking about, for example, if they had
11 | said they -- he asked if they had sent me applications for me
12 | to keep in my file. That was my understanding. That is what
13 | I didn't want, sir.

14 | JUDGE CHACHKIN: Well, why -- I understood your
15 | answer to be that nothing from the Corporation was to be sent
16 | to you.

17 | MR. ESPINOZA: No. They, they would send me things,
18 | but when it comes to legal documents like licenses, that's
19 | what I meant, sir.

20 | JUDGE CHACHKIN: You mean an application for you to
21 | look at? Is, is that -- would that be --

22 | MR. ESPINOZA: No. The applications I would gener-
23 | ally look at, at her office when I went.

24 | JUDGE CHACHKIN: But you told me that you very
25 | rarely could go -- went to her office because of the distance.

1 MR. ESPINOZA: There were times when I did go, sir.

2 JUDGE CHACHKIN: Well, how frequently did you go to
3 your office during the year?

4 MR. ESPINOZA: There were occasions when I had
5 perhaps a business meeting in the area, sir.

6 JUDGE CHACHKIN: On those occasions you would go.
7 How often would that occur?

8 MR. ESPINOZA: I couldn't give you an exact count,
9 sir.

10 JUDGE CHACHKIN: Go ahead, Mr. Cohen.

11 BY MR. COHEN:

12 Q Well, following up on what the Judge said, you, you
13 -- it's, it's true, isn't it, that it was difficult to get
14 from your home and your church to the Trinity office, because
15 of traffic and, and --

16 A Sometimes it was, sir.

17 Q And I think you once told me, the deposition, it
18 took you often two hours?

19 A Sir, on Fridays, during traffic hour.

20 Q So, it was a chore to get to the Trinity offices,
21 wasn't it?

22 A Yes, sir.

23 Q Now, did you have any consideration to, to asking
24 NMTV to secure a Post Office Box for you near your residence
25 so that, so that mail could be sent to you at a Post Office

1 Box?

2 A I have a Post Office Box, sir. No, my concern is
3 keeping legal documents was what I was referring to.

4 Q Did you ever, did you ever give consideration to
5 having documents sent to a Post Office Box and then having a,
6 a safe deposit box rented which NMTV would pay for --

7 A No, sir. That I --

8 Q -- where your documents --

9 A -- did not consider, no, sir.

10 Q -- where your documents could be kept?

11 A That I did not consider, sir.

12 Q Did you ever explain to Mrs. Duff your, your secu-
13 rity concerns?

14 A I believe I did, sir.

15 Q And she never suggested that you secure a safe
16 deposit box to keep these materials?

17 A Well, at the time it was something that we were
18 considering how to better improve the security of, of our
19 offices at, at the church, and which eventually we did. We
20 put in a good alarm, alarm system that's connected to the
21 police department and, and bars, you know, on the doors -- I'm
22 sorry, the windows.

23 Q Well, when you had the better security system at the
24 church, did you then tell Mrs. Duff --

25 A No. I --

1 Q -- to send you --
2 A -- didn't bring it up --
3 Q -- material?
4 A -- again. No, sir.
5 Q You never gave consideration to that?
6 A I just never brought it up again, sir.
7 Q You never thought of it?
8 A No.
9 Q Well, turning back to the Certification of Prefer-
10 ences which you have before you, my first question is concern-
11 ing the minority preference, and I recognize that you're not
12 an attorney, pastor, but what I do think the record should
13 reflect is your understanding as to why the -- why did
14 Translator TV, Inc., check the box under "Minority
15 Preference," "yes." And do you -- and I can help you find
16 that if you let me show you.
17 A Yeah.
18 Q What I'm talking about --
19 A Number one over here.
20 Q I'm talking about, pastor, you see where it says
21 "Minority Preference" and the box "yes" is checked?
22 A Yes, sir.
23 Q And as a Director of Translator Television, Inc.,
24 what was your understanding, sir, as to why the box was
25 checked "yes"?

1 A Because there were more minorities on the Corpora-
2 tion, sir.

3 Q You mean you and Mrs. Duff were both minorities and
4 Dr. Crouch was not?

5 A Yes, sir. That's what I meant. Yes, sir.

6 Q And that information was given to you by whom?

7 A I believe it was Mrs. Duff.

8 Q Now, turn to the Diversification Preference. And
9 you'll notice -- you see that right underneath it?

10 A Yes, sir.

11 Q And number two, you, you notice that the, the box
12 "yes" was certified? "Yes," then there's an "X"? Could I
13 help you find that?

14 A Yes, sir. No, I have it.

15 Q You see it? Okay. And do you -- did you have an
16 understanding as to what the Diversification Preference was?

17 A Mr. Cohen, at the time I did. At the time. It's,
18 it's, it's been awhile since I've seen this, this terminology.

19 Q Did you have an understanding as to what the reason
20 was that the box was checked yes?

21 A No.

22 Q Were you ever told the reason?

23 A Back then, yes, sir. It was explained to me.

24 Q All right. When was it explained to you? When did
25 this occur?

1 A I, I couldn't give you an exact date, but I, I know
2 that, that Mrs. Duff had talked to me about this.

3 Q Thank you. You can put that aside. You can accept
4 as a fact, pastor, that NMTV -- TTI and NMTV had purchase
5 orders and check requisition forms. That's in evidence at
6 this proceeding. You can accept that.

7 My question is did you ever see any purchase order,
8 ever? As you sit here today, have you ever seen a, a TTI or a
9 -- strike that -- an NMTV purchase order?

10 A Not that I recall, Mr. Cohen.

11 Q Okay.

12 A Right now I wouldn't remember what it looks like,
13 sir.

14 Q Well, let me show you one --

15 A Okay.

16 Q -- and see if that will help your memory.

17 A Okay.

18 MR. COHEN: Can we go off the record for a second,
19 Your Honor?

20 JUDGE CHACHKIN: Off the record.

21 (Off the record. Back on the record.)

22 JUDGE CHACHKIN: Back on the record.

23 BY MR. COHEN:

24 Q Look at Bureau Exhibit 255, pastor.

25 A 255?

1 Q It should be in Volume 5.

2 A Okay.

3 Q That's a purchase order. You see scratched out is
4 Trinity Broadcasting and NMTV is written on the top?

5 A Yes, sir.

6 Q Okay. That's the form we're talking about -- I'm
7 talking about. The NMTV purchase orders were identical. It
8 just had NMTV written in. Before this instance, have you ever
9 seen such a form?

10 A I believe not, sir.

11 Q Now, this form serves two purposes. It's a purchase
12 order and a check requisition. I take it you've never seen it
13 -- if you haven't seen it as a purchase order, you've never
14 seen it as a check requisition?

15 A Correct.

16 Q Do you have, as of the time you resigned, did you
17 have any knowledge as to what the procedure was as to how NMTV
18 paid its bills, the actual procedure?

19 A I believe not, sir.

20 Q In your testimony, you -- and, and I don't need to
21 go over this with you unless you have to to answer the
22 question. In your written testimony, you dis-- you talk about
23 Paul Crouch wanting to build the Stafford, or the Houston,
24 construction permit and you and Mrs. Duff wanted to sell it.
25 Do you recall that?

1 A Yes, sir. Yes.

2 Q Did you ever learn why Paul Crouch wanted to build
3 the Houston, or the Stafford, station?

4 A I'm reasonably sure that, that it, it was brought up
5 in discussion. I couldn't tell you right now, sir.

6 Q You couldn't tell me why. That's what you're say-
7 ing?

8 A That's correct, sir.

9 Q Now, have you ever seen any monthly financial re-
10 ports that were generated by NMTV?

11 A Mr. Cohen, that I don't recall, sir.

12 Q And I'm correct that no financial reports of any
13 kind were ever sent to you?

14 A No, sir.

15 Q Look at Bureau Exhibit 300, please.

16 MR. TOPEL: Volume 5, sir.

17 BY MR. COHEN:

18 Q That was a meeting on April 19, 1990. Do you see
19 that?

20 A Yes, sir.

21 Q And you, and you were present at that meeting?

22 A Yes, sir.

23 Q Okay. Now, you'll notice the Board passed a reso-
24 lution authorizing the Officers to investigate a possible
25 purchase for \$9 million, which is a powerful lot of money. Do

1 | you see that?

2 | A Yes, sir.

3 | Q Now, what, what big city is Hammond, Indiana, next
4 | to?

5 | A I don't think I know, sir.

6 | Q Well, do you have a recollection of, of, of voting
7 | on this matter?

8 | A Mr. Cohen, I don't have very much recollection about
9 | this meeting at all.

10 | Q Do you -- was there any -- what, what was your
11 | understanding of where the \$9 million was going to come from
12 | to purchase the station in Hammond?

13 | A Mr. Cohen, I believe that during my deposition I
14 | explained my reasons for this particular meeting. It was a
15 | meeting that ended abruptly, so I, I don't remember much of
16 | this meeting.

17 | Q Oh, I recall that. Yes. Yes, I do recall your
18 | deposition. I remember that.

19 | A I, I honestly don't remember, sir.

20 | Q Let's, let's go on to something new.

21 | A Thank you, sir.

22 | Q Bureau Exhibit 133. Could you look at that?

23 | MR. TOPEL: Volume 3. Exhibit 133, right, Mr.
24 | Cohen?

25 | MR. COHEN: Yes.

1 MR. TOPEL: 133.

2 MR. ESPINOZA: Yes, sir.

3 BY MR. COHEN:

4 Q Strike that. And let's look at Bureau Exhibit 137.
5 Now, Bureau Exhibit 3-- 137 is a letter from Colby May con-
6 cerning the purchase of the Channel 61 Wilmington sta--
7 Wilmington station. Do you see that?

8 A Yes, sir.

9 Q Okay. Now, am I correct that you were never sent a
10 copy of that letter?

11 A That's correct, sir.

12 Q Now, were you aware that Mr. May was, was, was
13 writing -- strike that. Were you aware prior to March 23,
14 1987, that, that Mr. May was instructed to write the letter
15 that he did to Jim Gammon?

16 A I believe not, sir.

17 Q You believe not?

18 A I believe not.

19 Q Now, pastor, did you ever become aware, and this,
20 this is -- this concerns the sale of the Odessa station, did
21 you ever become aware from anybody that the station's success
22 depended upon carriage upon cable television systems in the
23 O-- in the Odessa area?

24 A I don't recall that at all, sir.

25 Q Now, is the name Ben Miller a name that's familiar

1 to you?

2 A Yes, sir.

3 Q And, and how's the name familiar?

4 A Well, I would see him from time to time when I went
5 to TBN. He's the engineer -- or at least was.

6 Q At TBN?

7 A Yes, sir.

8 Q Now, do you have any knowledge as to whether Mr.
9 Miller provided any kind of engineering services for TTI or
10 NMTV while you were a Director of both companies?

11 A Mr. Cohen, it was my understanding that he did, sir.

12 Q And do you have an understanding as to what engi-
13 neering services he, he provided?

14 A Sir, I believe it was at the Odessa station.

15 Q What did he do?

16 A I'm not sure of the technicalities of his work. I
17 believe that -- no, no. I, I'm not sure I know, sir. I know
18 he's an engineer.

19 Q Well, did, did NMTV or did TTI employ him?

20 A I believe not, sir.

21 Q Do you know whether he was paid by TTI or NMTV?

22 A That I don't know, sir.

23 Q Do you know whether he -- do you know what -- do you
24 know whether he had any role in the construction of the Odessa
25 station?

1 A I'm tempted, tempted to say yes, but I'd be guess-
2 ing. No, sir, not at all.

3 Q Do you know whether or not he visited Odessa while
4 the station was being constructed?

5 A It's my impression that he did, sir.

6 Q Now, what about Portland? Did he -- did Mr., did
7 Mr. Miller have any role in the construction of Portland?

8 A My impression is that he, he did go to Portland.

9 Q And in what capacity did he go to Portland?

10 A As an engineer.

11 Q And who was he working for?

12 A To the best of my knowledge, he's an employee of
13 TBN, sir.

14 Q Well, did it strike you that, that it was odd or
15 unusual that he was travelling to Portland on behalf of NMTV,
16 NMTV when he was a TBN employee?

17 A No, sir. No, not at all.

18 Q You thought that was an appropriate thing to have
19 happen?

20 A Well, I can only go from my own experience.

21 Q Sure.

22 A When we're going to start a church someplace else,
23 we, we send money, we send personnel. If they don't have a
24 congregation, we, we try and encourage families to go over
25 there to help them get started. So, it seemed the most

1 | logical thing to me, sir. It didn't strike me as anything
2 | wrong.

3 | Q Because TBN was helping NMTV?

4 | A Yes, sir.

5 | Q As much as one church would help another church?

6 | A Yes, sir.

7 | Q And, and, and you looked upon Trinity as a wealthier
8 | church and NMTV as a, as a, a poorer church, is that a accu-
9 | rate statement?

10 | A Well, it had certainly been around longer, so I
11 | would assume yes, of course. It was -- it, it had more fi-
12 | nances, yes.

13 | Q And, and more resources?

14 | A Yes, sir. That's correct.

15 | Q And, so, it was appropriate that NMTV draw upon the
16 | resources of, of, of the, the other company, which was well --
17 | better established?

18 | A I believe so. It, it was fine with me. It, it
19 | seemed logical, sir.

20 | Q Have you ever heard of a company called Media
21 | Services Agency?

22 | A That doesn't sound familiar.

23 | Q Have you ever heard of a company called Planck
24 | Construction Company?

25 | A I believe I just saw it on the -- didn't I just see